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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91193398
Party	Defendant Waste Management, Inc.
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

GP Harmon Recycling LLC	§	
	§	Opposition No. 91193398
Opposer,	§	
	§	Application Serial Nos. 77/725,583,
v.	§	77/725,585, and 77/725,578
	§	
Waste Management, Inc.,	§	
	§	
Applicant.	§	

**APPLICANT'S ANSWER TO CONSOLIDATED NOTICE OF OPPOSITION**

Applicant Waste Management, Inc. ("WM") in answer to Opposer GP Harmon Recycling, LLC's Consolidated Notice of Opposition ("Notice") answers as follows:

To the extent an answer is required to the statements in the introductory paragraphs on pages 1-2 of the Notice, WM admits that it is a corporation organized and existing under the laws of the State of Delaware and it is located and doing business at 1001 Fannin, Suite 4000, Houston, Texas 77002. WM also admits that it is the owner of U.S. Trademark Application Serial Nos. 77/725,583, 77/725,585, and 77/725,578, each filed on April 29, 2009, for registration of the mark:



(referred to hereafter as "WM's Mark").

WM admits that it seeks registration of WM's Mark on the Principal Register for the services listed in each of the applications. WM is without sufficient knowledge or information to form a belief as to the truth of the allegations regarding Opposer's corporate organization or its location for conducting business as alleged in the first paragraph on page 1 of the Notice, and therefore, these allegations are accordingly

denied. WM denies the remaining allegations contained in the introductory paragraphs on pages 1-2 of the Notice.

1. WM denies the allegations contained in paragraph 1 of the Notice.
2. WM is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 2 of the Opposition and, thus, denies all of the allegations contained in paragraph 2 of the Opposition.
3. WM is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 3 of the Opposition and, thus, denies all of the allegations contained in paragraph 3 of the Opposition.
4. WM is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 4 of the Opposition and, thus, denies all of the allegations contained in paragraph 4 of the Opposition.
5. WM denies the allegations contained in paragraph 5 of the Notice.
6. WM denies the allegations contained in paragraph 6 of the Notice.
7. WM denies the allegations contained in paragraph 7 of the Notice.
8. WM is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 8 of the Opposition and, thus, denies all of the allegations contained in paragraph 8 of the Opposition.
9. WM is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 9 of the Opposition and, thus, denies all of the allegations contained in paragraph 9 of the Opposition.
10. WM is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in the first sentence of paragraph 10 of the Opposition and,

thus, denies all of the allegations contained in the first sentence of paragraph 10 of the Opposition. WM denies the allegations contained in the second sentence of paragraph

11. WM denies the allegations contained in paragraph 11 of the Opposition.

12. WM denies the allegations contained in paragraph 12 of the Opposition.

13. WM denies the allegations contained in paragraph 13 of the Opposition.

14. WM denies the allegations contained in paragraph 14 of the Opposition.

15. WM denies the allegations contained in paragraph 15 of the Opposition.

WHEREFORE, PREMISES CONSIDERED, Applicant Waste Management, Inc. prays that Opposer's Consolidated Notice of Opposition be dismissed and that registrations based on U.S. Trademark Application Serial Nos. 77/725,583, 77/725,585,

and 77/725,578 for the mark



be issued.

Respectfully submitted,

DATED this 18th day of May, 2010.

/Ben D. Tobor/  
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ATTORNEYS FOR APPLICANT,  
WASTE MANAGEMENT, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2010, a true and correct copy of the foregoing Applicant's Answer to Consolidated Notice of Opposition was served by e-mail on the following:

Leslie J. Lott  
ljlott@lfiplaw.com

Jamie Rich Vining  
jrvining@lfiplaw.com

/Ben D. Tobor/